

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

WILLIAM J. WINDHAM and)	
GWENDOLYN JOYCE WINDHAM,)	
)	
Plaintiffs,)	
)	CASE NO. 3:05 CV-472-M
v.)	
)	
B. W. CAPPS & SONS, INC.,)	
)	
Defendant.)	

PLAINTIFFS' REQUESTED VOIR DIRE QUESTIONS

COME NOW, Plaintiffs herein and submit their requested *Voir Dire* questions respectfully requesting that they be allowed to inquire as to the following:

1. Any questions listed on the Juror Information Questionnaire provided and utilized by the Middle District of Alabama, including any reasonable clarifying questions.
2. Questions qualifying the prospective jurors as to the identification of the parties and all counsel.
3. Questions qualifying the prospective jurors as to knowledge of the expected witnesses in the case.
4. Does anyone have such a dislike of persons that have served in the United States Military in Vietnam and Korea such that you do not feel you can be fair and impartial in this case?

5. Does anyone have such a religious, moral or other objection to the Vietnam War such that you do not feel you could be fair and impartial in this case if the Plaintiff had served in Vietnam?
6. Does anyone feel or believe for whatever reason, whether religious, moral or otherwise, that they could never award a plaintiff an amount of money in a lawsuit if the evidence and law supported such an award?
7. Is there anyone here today who simply feels like they do not want to serve on this jury for any reason?

This 22nd day of May, 2006.

SAMS, LARKIN & HUFF, LLP

/S/ JAMES BALLI

By: _____

James A. Balli
Attorney for Plaintiffs
Ala. Bar No. BAL036

376 Powder Springs Street
Suite 100
Marietta, GA 30064
(770) 422-7016

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the foregoing PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS upon all parties by electronic noticing procedures set forth by this Court as set forth below:

Mr. James R. Mckoon, Jr.
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This 22nd day of May, 2006.

SAMS, LARKIN & HUFF, LLP

/S/ JAMES BALLI

By: _____

James A. Balli
Attorney for Plaintiffs
Ala. Bar No. BAL036

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